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6 **UNITED STATES DISTRICT COURT**
7 **WESTERN DISTRICT OF WASHINGTON**
8 **AT SEATTLE**

9 FEDERAL TRADE COMMISSION, *et al.*,

10 Plaintiffs,

11 v.

12 AMAZON.COM, INC., a corporation,

13 Defendant.
14

CASE NO.: 2:23-cv-01495-JHC

**STIPULATED MOTION AND
ORDER REGARDING SEALING
ISSUES**

NOTE ON MOTION CALENDAR:
October 25, 2024

15 Plaintiffs may file one or more discovery motions in compliance with the Court's orders
16 regarding interim discovery deadlines. (*See* Dkt. ##288, 310). Because the briefing, declarations,
17 and exhibits for those motions may contain a significant amount of information that Amazon or
18 non-parties have designated Highly Confidential—Attorneys' Eyes Only or Confidential under
19 the Protective Order. (Dkt. #160.), and to avoid burdening the Court with multiple sealing
20 motions, the parties, by and through their respective attorneys of record, hereby stipulate and
21 agree to the following filing and sealing procedures for any discovery motions filed on or before
22 October 31, 2024 and any subsequent opposition or reply briefs:
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24

- 1 1. Each party shall provisionally file under seal its briefs, declarations, and exhibits
2 containing material designated Highly Confidential—Attorneys’ Eyes Only or
3 Confidential under the Protective Order. The party shall contemporaneously file a
4 public version of any sealed documents, redacting only the material that is
5 provisionally filed under seal. The party is not required to file a motion to seal at
6 the same time the party files the sealed documents.
- 7 2. Nothing in this Stipulation and Order relieves the parties of their obligations,
8 under Local Civil Rule 5(g)(1)(A), to meet and confer before any filing to
9 determine whether the designating party will withdraw its confidentiality
10 designations.
- 11 3. Within 14 days of the date any reply is due, any party or non-party seeking to
12 maintain under seal any material that was provisionally filed under seal pursuant
13 to Paragraph 1 above shall file one omnibus motion to seal. The moving party or
14 non-party shall include a table identifying: the document containing material to be
15 maintained under seal, including docket number; a pincite for the material to be
16 maintained under seal; and the basis for maintaining that material under seal.
- 17 4. Any material provisionally filed under seal pursuant to Paragraph 1 that is not the
18 subject of a motion to seal filed within 14 days of the date any reply is due shall
19 be deemed unsealed the following business day.

1 Stipulated to and respectfully submitted this 25th day of October, 2024, by:

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ORDER

IT IS SO ORDERED.

DATED this 28th day of October, 2024.

A handwritten signature in black ink, reading "John H. Chun". The signature is written in a cursive style with a horizontal line underneath the name.

JOHN H. CHUN
UNITED STATES DISTRICT JUDGE